



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Acting Director

XX XXXX, 2017

Mr. Antonio Gutierrez
Executive Vice President, Production Operations
ITG Brands – Production Operations
2525 East Market Street
Greensboro, NC 27401

Dear Mr. Moring:

SUBJECT: Air Quality Permit No. 04398T21
Facility ID: 4100198
ITG Brands – Production Operations
Greensboro, North Carolina
Guilford County
Fee Class: Title V
PSD Status: Major

Dear Mr. Gutierrez:

In accordance with your completed Air Quality Permit Applications for renewal and minor modification of your Title V permit received July 30, 2015 and October 14, 2016, respectively, we are forwarding herewith Air Quality Permit No. 04398T21 to ITG Brands – Production Operations, 2525 East Market Street, Greensboro, Guilford County, North Carolina authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been listed for informational purposes as an "ATTACHMENT 2." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Increment tracking does not apply to this minor modification. Although Guilford County's minor source baseline for PM-10 and SO₂ has been triggered; there are no emissions increases or decreases associated with this minor modification.

This Air Quality Permit shall be effective from XX XXXX, 2017 until XX XXXX, 2022, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact David B. Hughes, at (919) 707-8711.

Sincerely yours,

William D. Willets, P. E., Chief, Permitting Section
Division of Air Quality, NCDEQ

Enclosure

c: Heather Ceron, EPA Region 4 - permit only
Winston Salem Regional Office
Central Files
Connie Horne (cover letter only)

ITG Brands – Production Operations
Air Quality Permit No. 04398T21

ATTACHMENT 1: Summary of Changes to the Permit

Page(s)	Section	Description of Change(s)
Cover letter	---	-modified to reflect current permit number, issue and effective dates.
All	Headers	-updated permit revision number, issue and effective dates.
---	Insignificant Activities	-added 300 gallon rum tote (IRUMTOTE) which replaces existing 21,000 gallon above ground rum (ethanol) tank (ES-T-3).
	2.1 A.2. d. e. & f.	-removed language due to No. 6 fuel oil no longer being used.
	2.1 A.3. c. d. & f.	-removed language due to No. 6 fuel oil no longer being used.
5	Section 1 (Table) and 2.1 B	-changed Tobacco Screen Material Collection ID No. ES-02.1 to ES-05.1 and Bagfilter ID No. CD-02-01 to CD-05-01. -changed Cigarette Making Operations (Line 3 through Line 11) ID Nos. ES-02.3 through ES-02.11 to ES-05.3 through ES-05.11 and Bagfilters ID Nos. CD-02-06 through CD-02-33 to CD-05-06 through CD-05-33. -removed ten Bagfilters ID Nos. CD-02-26, CD-02-08, CD-02-28, CD-02-12, CD-02-34, CD-02-15, CD-02-17, CD-02-20, CD-02-22, and CD-02-23.
30-32	Section 1 (Table) and 2.1 C	-changed Tobacco cutting and blending process ID No. ES-03.1 to ES-02-1 and Bagfilters ID Nos. CD-03-01 through CD-03-03 to CD-02-01 through CD-02-03. -changed Hauni Steam dryer no. 1 ID No. ES-03.2 to ES-02-07 and Bagfilter from CD-03-04 to CD-02-04. -changed Associated Hauni Steaming tunnel no. 1 ID No. ES-03.3 to ES-02-08. -changed Hauni Steam dryer no. 2 ID No. ES-03.4 to ES-02-09 and Bagfilter from CD-03-07 to CD-02-05. -changed Associated Hauni Steaming tunnel no. 2 ID No. ES-03.5 to ES-02-10. -changed Top flavoring line no. 1 ID No. ES-03.6 to ES-04-1 and Bagfilter and Packed Tower Scrubber ID Nos. CD-03-05 and CD-03-06 to CD-04-01 and CD-04-06. -changed Top flavoring line no. 2 ID No. ES-03.7 to ES-04-2 and Bagfilter and Packed Tower Scrubber ID Nos. CD-03-05 and CD-03-09 to CD-04-02-09. -removed 15 NCAC 02D .0958
###	Section 1 (Table) and 2.1 D	-changed Tobacco reclamation ID No. ES-04 to ES-06 and three Bagfilters ID Nos. CD-04-01, CD-04-02, and CD-04-04 to CD-06-01, CD-06-02, and CD-06-04.

###	Section 1 (Table) and 2.1 E	-changed Cigarette reclamation ID No. ES-05 to ES-07 and three Bagfilters ID Nos. CD-07-01 through CD-07-03.
###	Section 1 (Table) and 2.1 F	-changed two burley tobacco steam dryers ID Nos. ES-06A and ES-06B to ES-02-05A and ES-02-05B. -removed 15A NCAC 02D .0958
###	Section 1 (Table) and 2.1 H	-changed Dry Ice Expanded Tobacco (DIET) process ID No. ES-09 to ES-03-01 and one pulse-jet Bagfilter ID No. CD-09-01 to CD-03-01. -removed One Tobacco Processing Plant (TPP) and associated Bagfilter CD-03-02. -removed 15A NCAC 02D .0958
###	2.1 H.2. c. d. e. & h.	-removed Monitoring/Recordkeeping for Bagfilter CD-03-02 (2.1 H.2. c. d. e. & h.) and renumbered (2.1 H.2. f. g. & i) to (2.1 H.2. c. d. & e.)
	2.1 I	-removed 15A NCAC 02D .0958
###	Section 1 (Table)	-removed Two underground ethanol storage tanks ID Nos. ES-T-1 and ES-T-2 and replaced with one 10,000 gallon above ground rum storage tank ES-T-4.
	2.2 A	-removed 15A NCAC 02D .0958. replaced 2.2 A with 2.2 B (15A NCAC 02D .1100
###	2.2 A.1 (Table)	-changed Stack ID Nos. and Emission Source ID Nos.
41-51	General Conditions	-updated shell conditions (v4.0 12/17/15).
52	List of Acronyms	-updated to current list of acronyms.

ITG Brands – Production Operations
Air Quality Permit No. 04398T21

ATTACHMENT 2: Insignificant Activities Pursuant to 15A NCAC 02Q .0503(8)

Emission Source ID	Source Description
IEG-1, IEG-3, and IEG-8 [MACT, Subpart ZZZZ] ³	Three natural gas-fired emergency generators (30.4 kW, 40.77 hp; 49.6 kW, 66.51 hp; 30 kW, 40.77 hp; respectively)
IEG-5, IEG-7, and IEG-9 through IEG-11 [MACT, Subpart ZZZZ] ³	Five diesel-fired emergency generators (200 kW, 268.2 hp; 200 kW, 268.2 hp; 181.3 hp; 135.2 kW, 181.3 hp; 125 kW, 167.63 hp; respectively)
IEG-12 [NSPS, Subpart III; MACT, Subpart ZZZZ] ³	Diesel-fired emergency generator (511 kW, 685 hp)
IEG-13 [NSPS, Subpart III; MACT, Subpart ZZZZ] ³	Diesel-fired Emergency Generator (80 kW, 133 BHP maximum rated power output)
IET-4	One 10,000 gallon above-ground Triacetin storage tank
IET-5	One 6,000 gallon above-ground Triacetin storage tank
ITUBS	Degreasing tubs
IBATS	Battery Charging Stations
IOILTKS	No. 2 Fuel Oil Storage Tanks
IWELD	Welding Areas
IBLAST	Sandblasting Operation
IPILOT	Pilot Plant Bagfilter (2,200 acfm; 0.008 tons per hour capacity)
IMENCONV	Menthol Line Conveyor
IMENVNT	Menthol Room Vent
IWWTCT	Water Treatment Chemical Tanks
ICOOL	Cooling Towers
IRNDLAB	Research and Development Laboratory
IQAQC	QA/QC Laboratory
ICPVS	Process Vacuum System (0.2 ton per hour capacity)
ICPVS2	Process Vacuum System (0.2 ton per hour capacity)
IDITVNT	DIET Conveyor Draw-off Vent (21 ton per hour capacity, 300 cfm)
ICASEVNT	Second Casing Cylinder Vent (21 ton per hour capacity)
IHSKPVS	Housekeeping Process Vacuum System (0.2 ton per hour capacity)
IHSKPVS-PLUGRM	Central Vacuum System for Plug Room
IBOILER	Natural gas-fired temporary boiler (4.5 million Btu per hour; 100 hp)
ISPRAY	Paint Spray Booth
IRUMTOTE	300 gallon Rum Tote

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 “Control of Toxic Air Pollutants” or 02Q .0711 “Emission Rates Requiring a Permit”.
3. For additional information regarding the applicability of MACT/GACT see the DAQ page titled “The Regulatory Guide for Insignificant Activities/Permits Exempt Activities”. The link to this site is as follows: <http://daq.state.nc.us/permits/insig/>



State of North Carolina
Department of Environmental Quality
Division of Air Quality

AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
04398T21	04398T20	XX XXX, 2017	XX XXX, 2022

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: **ITG Brands – Production Operations**

Facility ID: **4100198**

Facility Site Location: **2525 East Market Street**
City, County, State, Zip: **Greensboro, Guilford County, North Carolina 27401**
Mailing Address: **2525 East Market Street**
City, State, Zip: **Greensboro, North Carolina 27401**

Application Numbers: **4100198. 15C and 4100198.16B**
Complete Application Date: **July 30, 2015 and October 14, 2016**

Primary SIC Code: **2111**
Division of Air Quality,
Address: **Winston-Salem Regional Office**
450 West Hanes Mill Road, Suite 300
Winston-Salem, North Carolina 27105

Permit issued this the **XX day of XXXX, 2017**

William D. Willets, P.E., Chief, Permitting Section
By Authority of the Environmental Management Commission

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ATTACHMENT

List of Acronyms

SECTION 1 - PERMITTED EMISSION SOURCES AND ASSOCIATED AIR POLLUTION CONTROL DEVICES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Page No (s).	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
7-12, 37 & 38	ES-01-A	One natural-gas/No. 2 ultra-low sulfur fuel oil-fired boiler (75 million Btu per hour heat input)	NA	NA
7-12, 37 & 38	ES-01-B ES-01-C	Two natural gas/No. 2 ultra-low sulfur fuel oil-fired boilers (37.5 million Btu per hour heat input, each)	NA	NA
12-15, 37 & 38	ES-05.1	Tobacco Screen Material Collection consisting of twenty-seven screens (16 inches in diameter each; 10.7 tons per hour maximum capacity across all nine lines)	CD-05-01	One bagfilter (145 square feet of filter area)
12-15, 37 & 38	ES-05.3	Cigarette Making Operations (Line 3): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-06 CD-05-27	Two parallel bagfilters (198 and 675 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.4	Cigarette Making Operations (Line 4): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-07 CD-05-31	Two parallel bagfilters (145 and 680 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.5	Cigarette Making Operations (Line 5): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-09 CD-05-10	Two parallel bagfilters (675 and 145 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.6	Cigarette Making Operations (Line 6): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-11 CD-05-32	Two parallel bagfilters (145 and 680 square feet of filter area, respectively)

Page No (s).	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
12-15, 37 & 38	ES-05.7	Cigarette Making Operations (Line 7): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all -nine lines)	CD-02-13 CD-02-33	Two parallel bagfilters (145 and 680 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.8	Cigarette Making Operations (Line 8): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-14 CD-05-29	Two parallel bagfilters (198 and 675 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.9	Cigarette Making Operations (Line 9): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-16 CD-05-18	Two parallel bagfilters (198 and 510 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.10	Cigarette Making Operations (Line 10): Tobacco pneumatically conveyed to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-19 CD-05-21	Two parallel bagfilters (198 and 675 square feet of filter area, respectively)
12-15, 37 & 38	ES-05.11	Cigarette Making Operations (Line 11): Tobacco pneumatically to nine lines of cigarette making machines (18.5 tons per hour total processing capacity across all nine lines)	CD-05-24	One bagfilter (675 square feet of filter area, respectively)
Cut and Blend Operations (21 tons per hour processing capacity consisting of the following operations:				
16-22, 37-39	ES-02-1	Tobacco cutting and blending process	CD-02-01	Bagfilter (500 square feet of filter area)
			CD-02-02	Bagfilter (942 square feet of filter area)
			CD-02-03	Bagfilter (462 square feet of filter area)
16-22, 37-39	ES-02-07	Hauni Steam dryer no. 1	CD-02-04	Bagfilter (2,325 square feet of filter area)
16-22, 37-39	ES-02-08	Associated Hauni Steaming tunnel no. 1	NA	NA

Page No (s).	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
16-22, 37-39	ES-02-09	Hauni Steam dryer no. 2	CD-02-05	Bagfilter (2,325square feet of filter area)
16-22, 37-39	ES-02-10	Associated Hauni Steaming tunnel no. 2	NA	NA
16-22, 37-39	ES-04-1	Top flavoring line no. 1	CD-04-01	Bagfilter (645square feet of filter area)
				in parallel with optional
			CD-04-06	packed tower scrubber (6 gallons per minute, minimum liquid injection rate)
16-22, 37-39	ES-04-2	Top flavoring line no. 2	CD-04-02	Bagfilter (645 square feet of filter area)
				in parallel with optional
			CD-04-09	packed tower scrubber (6 gallons per minute, minimum liquid injection rate)
16-22, 37-39	ES-04-3	Menthol addition	NA	NA
16-22, 37-39	ES-02-02 through ES-02-04	Three Direct Conditioning and Casing Cylinder (DCCC) lines (8.5 tons per hour tobacco processing capacity each) to add moisture (water/steam) to tobacco	NA	NA
22-26, 37 & 38	ES-06	Tobacco reclamation: Two pneumatically loaded silos discharging to screens and a separator (1.5 tons per hour processing capacity)	CD-06-01, CD-06-02, CD-06-04	Three bagfilters (942, 942, and 398 square feet of filter area, respectively)
26-28, 37 & 38	ES-07	Cigarette reclamation: Chute feeds vibrating screen, cigarettes threshed by fan and pneumatically conveyed to series of vibrating screens (2.5 tons per hour processing capacity)	CD-07-01 through CD-07-03	Three bagfilters (395, 351, and 351 square feet of filter area, respectively)
28-30, 37-39	ES-02-05A ES-02-05B	Two burley tobacco steam dryers with reordering (3 tons per hour processing capacity each) to add casings/water to tobacco	NA	NA
30-32, 37 & 38	ES-08	Central vacuum cleaning system for Tobacco Cutting, Fishburne, Cut Tobacco Storage, and Pre-menthol areas.	CD-08-01 CD-08-02	One Cyclone (60 inches in diameter) and Bagfilter (468 square feet of filter area) in series

Page No (s).	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
32-35, 37-39	ES-03-01	Dry Ice Expanded Tobacco (DIET) process consisting of: -One impregnation chamber where CO ₂ and water are added to the tobacco	CD-03-01**	One pulse-jet bagfilter (236 square feet of filter area) installed on the impregnation chamber
32-35, 37-39	ES-03-03	DCCC (Direct Conditioning and Casing Cylinder) line (8.5 tons per hour processing capacity) to moisturize tobacco prior to the DIET impregnation chamber	NA	NA
32-35, 37-39	ES-03-02	One natural gas-fired process heater (6.0 million Btu per hour) to condition air in the Tobacco Processing Plant (TPP)	NA	NA
32-35, 37-39	ES-02-06	Final casing: Moisture added to tobacco in two tumblers (21 tons per hour processing capacity)	NA	NA
	ES-T-4*	One above ground rum storage tank (10,000 gallon capacity)	NA	NA

* There are no applicable requirements for this source.

** This control device is optional and not used to demonstrate compliance with any applicable standard.

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1 - Emission Source(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the monitoring, recordkeeping, and reporting requirements to which those requirements apply:

A. Three natural gas/ No. 2 ultra-low sulfur fuel oil-fired boilers (ID Nos. ES-01-A, ES-01-B, and ES-01-C)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.30 pounds per million Btu heat input	15A NCAC 02D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	40 percent opacity	15A NCAC 02D .0521
Hazardous Air Pollutants	Work Practices	15A NCAC 02D .1111

1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of fuel oil that are discharged from these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**) into the atmosphere shall not exceed 0.30 pounds per million Btu heat input.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas/No. 2 ultra-low sulfur fuel oil in these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**).

2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping is required for sulfur dioxide emissions from the firing of natural gas or No. 2 ultra-low sulfur oil in these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**).

Reporting [15A NCAC 02Q .0508(f)]

- d. No reporting is required for sulfur dioxide emissions from the firing of natural gas or No. 2 ultra-low sulfur oil in these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**).

3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping is required for visible emissions from the firing of natural gas or No. 2 ultra-low sulfur oil in these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**).

Reporting [15A NCAC 02Q .0508(f)]

- d. No reporting is required for visible emissions from the firing of natural gas or 2 ultra-low sulfur oil in these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**).

4. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

Applicability [40 CFR 63.11193, 63.11194(a)(1), (b), 63.11200(c)]

- a. For these sources (**ID Nos. ES-01-A, ES-01-B, and ES-01-C**), the Permittee shall comply with all applicable provisions, including the notification, testing, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart JJJJJ, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers", including Subpart A "General Provisions."

Definitions and Nomenclature

- b. For the purposes of this permit condition, the definitions and nomenclature contained in 40 CFR 63.11237 shall apply.

General Provisions [40 CFR 63.11235]

- c. The Permittee shall comply with the General Provisions as applicable pursuant to Table 8 of 40 CFR 63 Subpart JJJJJ.

Compliance Dates

- d. The Permittee shall achieve compliance with the initial tune up and energy assessment requirements no later than March 21, 2014.
 - i. These requirements have been met on 01/06/2012 (ES-01-A), 11/09/2011 (ES-01-B), and 11/08/2011 (ES-01-C).
- [40 CFR 63.11196(a)(1), (a)(3), 63.11210(c)]

Notification of Compliance Status [40 CFR 63.11225]

- e. The Permittee shall submit a Notification of Compliance Status no later than July 19, 2014.
 - i. This requirement has been met on 02/14/2014.

General Compliance Requirements [15A NCAC 02Q .0508(b)]

- f. At all times the Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.11205(a)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in condition f. are not met.

Performance Tune-up Requirements [15A NCAC 02Q .0508(b)]

- g. The Permittee shall conduct an initial tune-up of the boiler and subsequent tune-ups biennially.
 - i. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up.

- ii. The Permittee shall conduct the tune-ups while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.
- iii. The tune-ups shall be conducted according to the following procedures:
 - A. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
 - B. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
 - C. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
 - D. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
 - E. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
 - F. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

[40 CFR 63.11201(b), Table 2, 40 CFR 63.11223(a),(b)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in condition g. are not met.

Energy Assessment Requirements [15A NCAC 02Q .0508(b)]

- h. The Permittee shall conduct a one-time energy assessment performed by a qualified energy assessor.
 - i. This requirement was met on 08/15/2012.
[40 CFR 63.11201(b), Table 2]

Recordkeeping [15A NCAC 02Q .0508(f)]

- i. The Permittee shall maintain the following records:
 - i. As required in 40 CFR 63.10(b)(2)(xiv), the Permittee shall keep a copy of each notification and report that was submitted to comply with this rule and all documentation supporting any Notification of Compliance Status that was submitted.
 - ii. The Permittee shall keep the following records to document conformance with the performance tune-ups:
 - A. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - B. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and

after the tune-up of the boiler.

- C. A description of any corrective actions taken as a part of the tune-up of the boiler.
- D. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- iii. The Permittee shall keep a copy of each boiler energy assessment report.
- iv. Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment.
- v. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in condition g., including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.11225(c), 63.11223(b)(6)]

- j. The records must be in a form suitable and readily available for expeditious review. The Permittee shall keep each record for 5 years following the date of each recorded action. The Permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years.

[40 CFR 63.11225(d)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in conditions i. and j. are not met.

Reporting [15A NCAC 02Q .0508(f)]

- k. The reporting requirements of 40 CFR 63.11225(b) shall be met by complying with General Condition P of Section 3 of this permit.

- B. Cigarette Making Operations (ID No. ES-05.3) with associated bagfilters (ID Nos. CD-05-06 and CD-05-27);**
Cigarette Making Operations (ID No. ES-05.4) with associated bagfilters (ID Nos. CD-05-07 and CD-05-31);
Cigarette Making Operations (ID No. ES-05.5) with associated bagfilters (ID Nos. CD-05-09 and CD-05-10);
Cigarette Making Operations (ID No. ES-05.6) with associated bagfilters (ID Nos. CD-05-11 and CD-05-32);
Cigarette Making Operations (ID No. ES-05.7) with associated bagfilters (ID Nos. CD-05-13 and CD-05-33);
Cigarette Making Operations (ID No. ES-05.8) with associated bagfilters (ID Nos. CD-05-14 and CD-05-29);
Cigarette Making Operations (ID No. ES-05.9) with associated bagfilters (ID Nos. CD-05-16 and CD-05-18);
Cigarette Making Operations (ID No. ES-05.10) with associated bagfilters (ID Nos. CD-05-19 and CD-05-21);
Cigarette Making Operations (ID No. ES-05.11) with associated bagfilter (ID No. CD-05-24);
Tobacco Screen Material Collection (ID No. ES-05.1) with associated bagfilter (ID No. CD-05-01)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	20 percent opacity (ID No. ES-05.1) 40 percent opacity (ID No. ES-05.3 through ES-05.11)	15A NCAC 02D .0521
	Alternate limitation: 20 percent opacity (ID Nos. ES-05.3 through ES-05.11)*	

* As cigarette making machines are replaced each associated Cigarette Making Operation shall become subject to the 20% standard.

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources (ID Nos. ES-05.1 and ES-05.3 through ES-05.11) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67}$$

Where E = allowable emission rate in pounds per hour
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from these sources: tobacco screen material collection (ID No. ES-05.1) with associated bagfilter (ID No. CD-05-01); one cigarette making operations (ID No. ES-05.3) with associated bagfilters (ID Nos. CD-05-06 and CD-05-27); one cigarette making operations (ID No. ES-05.4) with associated bagfilters (ID Nos. CD-05-07 and CD-05-31); one cigarette making operations (ID No. ES-05.5) with associated bagfilters (ID Nos. CD-05-09 and CD-05-10); one cigarette making operations (ID No. ES-05.6) with associated bagfilters (ID Nos. CD-05-11 and CD-05-32); one cigarette making operations (ID No. ES-05.7) with associated bagfilters (ID Nos. CD-05-13 and CD-05-33); one cigarette making operations (ID No. ES-05.8) with associated bagfilters (ID Nos. CD-05-14 and CD-05-29); one cigarette making operations (ID No. ES-05.9) with associated bagfilters (ID Nos. CD-05-16 and CD-05-18); one cigarette making operations (ID No. ES-05.10) with associated bagfilters (ID No. CD-05-19 and ES-05-21); and one cigarette making operations (ID No. ES-05.11) with associated bagfilter (ID No. CD-05-24). To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
- ii. an annual (for each 12-month period following the initial inspection) internal inspection of the bagfilters' structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilters are not inspected and maintained.

- d. The Permittee shall operate and maintain a pressure drop indicator on each bagfilter. The pressure drop across each bagfilter shall be maintained between 0.5 and 8.0 inches of water. To ensure compliance with this requirement, the Permittee shall monitor the pressure drop indicator on each bagfilter weekly and record its reading in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the pressure drop indicators are not maintained and their readings recorded.
- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the bagfilters; and
 - iv. any variance from manufacturer's recommendations, if any, and corrections made.
 The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- g. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-05.1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.
- b. Until these cigarette machines are replaced, visible emissions from these sources (**ID Nos. ES-05.3 through ES-05.11**) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity.
- c. After each cigarette machine is replaced, visible emissions from these sources (**ID Nos. ES-05.3 through ES-05.11**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- d. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 B.1.a, b and c above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- e. To ensure compliance, once a week, the Permittee shall observe the emission points of these sources (**ID Nos. ES-05.1, ES-05.3 through ES-05.11**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement.

The Permittee shall establish “normal” for these sources (ID Nos. **ES-05.3** through **ES-05.11**) within 30 days of commencing operation of the replacement cigarette making machines.

If visible emissions from these sources are observed to be above normal, the Permittee shall either:

- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
- ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 B.2.a , b and c above.

If the above normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- f. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- g. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

- h. **State Enforceable Only-Notification Requirement**

The Permittee shall notify the Winston-Salem Regional within 15-days of the replacement of each cigarette making machine

C. The following sources:**Table 2.1.C.**

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Cut and Blend Operations (21 tons per hour processing capacity consisting of the following operations:			
ES-02-1	Tobacco cutting and blending process	CD-02-01	Bagfilter (500 square feet of filter area)
		CD-02-02	Bagfilter (942 square feet of filter area)
		CD-02-03	Bagfilter (462 square feet of filter area)
ES-02-07	Hauni Steam dryer no. 1	CD-02-04	Bagfilter (2,325) square feet of filter area)
ES-02-08	Associated Hauni Steaming tunnel no. 1	NA	NA
ES-02-09	Hauni Steam dryer no. 2	CD-02-05	Bagfilter (2,325 square feet of filter area)
ES-02-10	Associated Hauni Steaming tunnel no. 2	NA	NA
ES-04-1	Top flavoring line no. 1	CD-04-01	Bagfilter (645 square feet of filter area)
			in parallel with optional
		CD-04-06	packed tower scrubber (6 gallons per minute, minimum liquid injection rate)
ES-04-2	Top flavoring line no. 2	CD-04-02	Bagfilter (645 square feet of filter area)
			in parallel with optional
		CD-04-09	packed tower scrubber (6 gallons per minute, minimum liquid injection rate)
ES-04-3	Menthol addition	NA	NA
ES-02-02 through ES-02-04	Three Direct Conditioning and Casing Cylinder (DCCC) lines (8.5 tons per hour tobacco processing capacity each) to add moisture (water/steam) to tobacco	NA	NA

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	40 percent opacity (ID No. ES-02-1, ES-04-1, ES-04-2, & ES-04-3) 20 percent opacity (ID Nos. ES-02-07, ES-02-08, ES-02-09, ES-02-10, ES-02-02 through ES-02-04 only)	15A NCAC 02D .0521
Volatile organic compounds	<u>POS - Avoidance Condition A</u> less than 530.9 tons per consecutive twelve (12) month period <u>applicable at all times</u> , and separate condition <u>AOS - Avoidance Condition B</u> less than 40 tons per consecutive twelve (12) month period incremental increase <u>applicable when scrubbers (ID Nos. CD-04-06 and CD-04-09) are not in operation</u>	15A NCAC 02Q .0317 (PSD Avoidance)
Toxic air pollutants	State-enforceable only See Section 2.2 A	15A NCAC 02D .1100

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in condition a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from these sources shall be controlled as described in Table 2.1.C. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
- ii. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters' structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilters are not inspected and maintained.

- d. The Permittee shall operate and maintain a pressure drop indicator on each bagfilter. The pressure drop across each bagfilter shall be maintained between 0.5 and 8.0 inches of water. To ensure compliance with this requirement, the Permittee shall monitor the pressure drop indicator on each bagfilter weekly and record its reading in a logbook (written or electronic format).

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the pressure drop indicators are not maintained and their readings recorded.

- e. Particulate matter emissions from these sources (**ID No. ES-04-1 and ES-04-2**) shall OPTIONALLY ALSO be controlled by two packed tower scrubbers (**ID Nos. CD-04-06 and CD-04-09**). To ensure that optimum control efficiency is maintained, the Permittee shall:

- i. Perform inspections and maintenance as recommended by the manufacturer when the scrubbers are in use;
- ii. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations when the scrubbers are in use, as a minimum, monthly, the inspection and maintenance requirement must include:
 1. inspection of spray nozzles to detect clogging or corrosion damage of nozzles and perform maintenance and repair when necessary to ensure proper operation of the scrubber;
 2. inspection, cleaning, and calibration of all associated instrumentation; OR as requested by the Permittee, in lieu of calibrating the magnehelic gauges monthly, the Permittee may opt to replace the magnehelic gauges (which measures pressure drop across the scrubbers) once per year.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the scrubbers are not inspected and maintained.

- iii. Install, operate, and maintain a pressure drop indicator, and a liquid flowmeter on each scrubber. When in use, the pressure drop across each scrubber shall be maintained between 3 and 8 inches of water. When in use, the liquid flow rate to each scrubber shall be maintained at a minimum of 6 gallons per minute. To ensure compliance with this requirement, the Permittee shall monitor the pressure drop indicator and each liquid flowmeter on each scrubber weekly when in use and record their readings in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the pressure drop indicators and flowmeters are not maintained and their readings recorded.
- f. The results of inspection and maintenance on the bagfilters and scrubbers shall be maintained in a logbook (written or electronic form) kept on site and made available to authorized representatives upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any inspection and maintenance performed; and
 - vi. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

- g. For these sources (**ID Nos. ES-02-02, ES-02-03 ES-02-04, ES-02-08 and ES-02-10**), the Permittee shall maintain production records such that the process rates “P” in tons per hour, as specified by the formula above can be derived and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

Reporting [15A NCAC 2Q .0508(f)]

- h. No reporting is required for particulate emissions from these sources (**ID Nos. ES-02-02, ES-02-03, ES-02-04, ES-02-08 and ES-02-10**).
- i. The Permittee shall submit the results of any maintenance performed on the bagfilters and scrubbers within 30 days of a written request by the DAQ.
- j. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the following sources shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity.

Emission Source I.D. No.	Emission Source Description
ES-02-1	Tobacco cutting and blending process
ES-04-1	Top flavoring line no. 1
ES-04-2	Top flavoring line no. 2
ES-04-3	Menthol addition

- b. Visible emissions from following sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Emission Source I.D. No.	Emission Source Description
ES-02-07	Hauni Steam dryer no. 1
ES-02-08	Associated Hauni Steaming tunnel no. 1
ES-02-09	Hauni Steam dryer no. 2
ES-02-10	Associated Hauni Steaming tunnel no. 2
ES-02-02 through ES-02-04	Three Direct Conditioning and Casing Cylinder (DCCC) lines

Testing [15A NCAC 02Q .0508(f)]

- c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.2.a and b above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- d. To ensure compliance, once a week the Permittee shall observe the emission points of these sources for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement.

The Permittee shall establish “normal” for these sources (**ID Nos. ES-02-07, ES-02-08, ES-02-09 and ES-02-10**) within 30 days of commencing operation of these sources.

If visible emissions from these sources are observed to be above normal, the Permittee shall either:

- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
- ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Sections 2.1 C.2.a and b above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii., above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- e. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**3. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS
for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

Primary Operating Scenario (POS) - AVOIDANCE CONDITION A - Applicable at all times

- a. To avoid the applicability of 15A NCAC 02D .0530, “Prevention of Significant Deterioration” as requested by the Permittee, the following emission sources shall discharge less than 530.9 tons of volatile organic compounds (VOCs) into the atmosphere in any twelve month rolling period.

Emission Source I.D. No.	Emission Source Description
ES-02-1	Tobacco cutting and blending process
ES-04-1	Top flavoring line no. 1
ES-04-2	Top flavoring line no. 2
ES-04-3	Menthol addition
ES-02-02 through ES-02-04	Three Direct Conditioning and Casing Cylinder (DCCC) lines

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in condition a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. The Permittee shall maintain an emissions logbook (written or electronic form) which demonstrates that actual annual (12-month) emissions of volatile organic compounds (VOCs) from these sources are less than 530.9 tons. The following data shall be measured, recorded, and calculations performed to obtain actual monthly volatile organic compound emissions. The logbook must be made available to an authorized representative upon request.
- i. Monthly, measure and record, the total quantity of tobacco processed by these sources;
 - ii. Monthly, measure and record the total amount of alcohol applied in the top flavoring and menthol process, which results in emissions of volatile organic compounds from this source. Permittee shall assume that 100% of the alcohol applied volatilizes.
 - iii. The actual VOC emissions will be calculated on a monthly basis for each type of material as applied, and for those VOCs emitted naturally from the tobacco during processing. VOC emissions will be quantified by compound and the calculation method will be based on test results, mass balance, or other engineering assumptions for which supporting documentation is maintained on file.

Alternate Operating Scenario (AOS) - AVOIDANCE CONDITION B - Applicable while scrubbers (ID Nos. CD-04-06 and CD-04-09) are not in use

- d. To avoid the applicability of 15A NCAC 02D .0530, Prevention of Significant Deterioration while the OPTIONAL scrubbers (ID Nos. CD-04-06 and CD-04-09) are not in use, these emission sources shall affect an incremental increase of less than 40 tons of volatile organic compounds (VOCs) into the atmosphere in any twelve (12) month rolling period. To ensure compliance with this condition, while the scrubbers are not in use, these sources shall be limited to VOC additions through "top flavoring" of less than 172,490 pounds per consecutive twelve months.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- e. Calculations of VOC additions through "top" flavorings per month shall be made at the end of each month. For the period(s) that the scrubbers are not in use VOC additions shall be determined by multiplying the total amount of each type of VOC-containing material consumed by the VOC content of the material. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the amounts of VOC containing materials or the VOC additions are not monitored and recorded.
- f. Calculations and the total amount of VOC additions for the period(s) that the scrubbers are not in use shall be recorded monthly in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the VOC emissions exceed this limit.

Reporting [15A NCAC 02Q .0508(f)]

- g. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
 - i. For the three direct conditioning and casing cylinder lines the initial report upon permit issuance shall include with the actual estimated monthly VOC emissions, detailed calculations, along with documentation, which provides the basis for these calculations. Future reports need only include the estimated monthly emissions.
 - ii. The monthly VOC additions for the period(s) that the scrubbers are not in use.
 - iii. Proposed changes to the method or factors used to calculate the monthly emissions shall be submitted, for approval, to the Regional Supervisor, Winston-Salem Regional Office.
 - iv. The monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.

4. ALTERNATIVE OPERATING SCENARIOS [15A NCAC 02Q .0508(j)]

The Permittee, contemporaneously with making a change from one alternate operating scenario to another, shall record in a logbook (written or electronic format) the scenario under which it is operating. [15A NCAC 02Q .0508(j)]

D. Tobacco Reclamation (ID No. ES-06) with associated bagfilters (ID Nos. CD-06-01, CD-06-02 and CD-06-04)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	20 percent opacity	15A NCAC 02D .0521
PM ₁₀	Compliance assurance monitoring (CAM)	15A NCAC 02D .0614

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from this source (**ID No. ES-06**) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where:} \quad \begin{array}{l} E = \text{allowable emission rate in pounds per hour} \\ P = \text{process weight in tons per hour} \end{array}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from this source (**ID No. ES-06**) shall be controlled by three (3) bagfilters (**ID Nos. CD-06-01, CD-06-02, and CD-06-04**). To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
- ii. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter's structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilters are not inspected and maintained.

- d. The Permittee shall operate and maintain a pressure drop indicator on each bagfilter. The pressure drop across each bagfilter shall be maintained between 0.5 and 8.0 inches of water. To ensure compliance with this requirement, the Permittee shall monitor the pressure drop indicator on each bagfilter weekly and record its reading in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the pressure drop indicators are not maintained and their readings recorded.
- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the bagfilters; and
 - iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- g. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-06**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of this source (**ID No. ES-06**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from this source are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given Section 2.1 D.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii., above, cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

3. 15A NCAC 02D .0614: COMPLIANCE ASSURANCE MONITORING

- a. Per 40 CFR 64 and 15A NCAC 02D .0614, the Permittee shall comply with the following:
- b. **Background**
 - i. **Emission Units.** One tobacco reclamation operation (**ID No. ES-06**)
- c. **Applicable Regulation, Emission Limit, and Monitoring Requirements.**
 - i. Regulation(s): 15A NCAC 02D .0515
 - ii. Emission Limits: $E = 4.10 \times P^{0.67}$ (5.38 lbs/hr PM based on a process rate of 1.50 tons per hour)
- d. Control Technology: Three bagfilters (2,282 total ft² of filter area, **ID Nos. CD-06-01, CD-06-02, and CD-06-04**)

- e. Monitoring Approach: The key elements of the monitoring approach are presented in the following table.

	Indicator
I. Indicator	Pressure drop across the control devices.
Measurement Approach	Pressure drop across the bagfilters is measured with differential pressure gauges, manometers, and/or alternative instrumentation as appropriate daily while operating.
II. Indicator Range	An excursion is defined as a pressure drop other than normal. Normal is defined as: -between 2 and 7 inches of water for CD-06-01 and CD-06-02, and -between 0.5 and 2.5 inches of water for CD-06-04. An excursion initiates corrective action and/or maintenance to be performed on any control device. If the press drop is outside of the required operating ranges above, the Permittee will follow the operation and maintenance plan for the bagfilter(s) and take correction action as expeditiously as practicable. The Permittee shall also keep a record of the type and date of any corrective action taken for the bagfilter(s).
QIP Threshold	None selected.
III. Performance Criteria	
A. Data Representativeness	Pressure taps are located at each bagfilter inlet and outlet. The gauge has a minimum accuracy of 0.5 inches of water.
B. Verification of Operational Status	The pressure gauges are checked daily while the tobacco reclamation process in is operation.
C. QA/QC Practices	Calibrate, maintain, and operate instrumentation using procedures that take into account manufacturer's specifications. At a minimum, a quarterly calibration of pressure monitoring gauge shall be required OR the Permittee may opt to replace the pressure monitoring gauge once per year instead of complying with the quarterly calibration requirement.
D. Monitoring Frequency	Pressure drop shall be recorded manually in a logbook on a daily basis for each day the tobacco reclamation process is in operation.
Data Collection Procedures	Recordings are manually recorded in a logbook daily while operating.
Averaging Periods	NA

Reporting [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

The report shall also include the following information, as applicable:

- i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

E. Cigarette Reclamation Operation (ID No. ES-07) with associated bagfilters (ID Nos. CD-07-01 through CD-07-03)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	40 percent opacity	15A NCAC 02D .0521

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from this source (**ID No. ES-07**) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \text{ Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 E.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from this source (**ID No. ES-07**) shall be controlled by three (3) bagfilters (**ID Nos. CD-07-01 through CD-07-03**). To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
 - i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
 - ii. an annual (for each 12-month period following the initial inspection) internal inspection of the bagfilters' structural integrity.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilters are not inspected and maintained.
- d. The Permittee shall operate and maintain a pressure drop indicator on each bagfilter. The pressure drop across each bagfilter shall be maintained between 0.5 and 8.0 inches of water. To ensure compliance with this requirement, the Permittee shall monitor the pressure drop indicator on each bagfilter weekly and record its reading in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the pressure drop indicators are not maintained and their readings recorded.
- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the bagfilters; and
 - iv. any variance from manufacturer's recommendations, if any, and corrections made.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- g. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-07**) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General

Condition JJ. If the results of this test are above the limit given in Section 2.1 E.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of this source (**ID No. ES-07**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from this source are observed to be above normal, the Permittee shall either:
- take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 E.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- the date and time of each recorded action;
 - the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - the results of any corrective actions performed.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

F. Burley Tobacco Dryers (ID No. ES-02-05A and ES-02-05B)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Toxic air pollutants	State-enforceable only See Section 2.2 A	15A NCAC 02D .1100

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources (**ID No. ES-02-05A and ES-02-05B**) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where, } E = \text{allowable emission rate in pounds per hour} \\ P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 F.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. The Permittee shall maintain production records, which specify the quantity of burley tobacco processed plus quantity of casings applied in these sources (**ID No. ES-02-05A and ES-02-05B**), such that the process rates "P" in tons per hour, as specified by the formula contained above can be derived, and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained or the types of materials and casing additions are not monitored.

Reporting [15A NCAC 02Q .0508(f)]

- d. No reporting is required for particulate emissions from these sources (**ID Nos. ES-02-05A and ES-02-05B**).

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in condition a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of these sources (**ID No. ES-02-05A and ES-02-05B**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement.

The Permittee shall establish "normal" for these sources in the first 30 days after startup following the effective date of permit no. 04398T16.

If visible emissions from these sources are observed to be above normal, the Permittee shall either:

- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
- ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 F.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii., above, cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

G. Central Vacuum Cleaning System (ID No. ES-08) with cyclone and bagfilters (ID Nos. CD-08-01 and CD-08-02) in series

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	20 percent opacity	15A NCAC 02D .0521

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from this source (**ID No. ES-08**) shall not exceed an allowable emission rate as calculated by the following equation:

$E = 4.10 \times P^{0.67}$ Where: E = allowable emission rate in pounds per hour
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 G.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from this source (**ID No. ES-08**) shall be controlled by a cyclone and a bagfilter (**ID Nos. CD-08-01 and CD-08-02**) in series. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
 - i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
 - ii. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter's structural integrity.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilters are not inspected and maintained.
- d. The Permittee shall operate and maintain a pressure drop indicator on the bagfilter. The pressure drop across the bagfilter shall be maintained between 0.5 and 8.0 inches of water. To ensure compliance with this requirement, the Permittee shall monitor the pressure drop indicator on the bagfilter weekly and record its reading in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the pressure drop indicators are not maintained and their readings recorded.
- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the bagfilters; and
 - iv. any variance from manufacturer's recommendations, if any, and corrections made.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- g. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-08**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 G.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of this source (**ID No. ES-08**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from this source are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given Section 2.1 D.2.a above.If the above-normal emissions are not corrected per i. above or if the demonstration in ii., above, cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.
- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

H. One DIET Expanded Process (ID No. ES-03-01) with associated bagfilter (ID No. CD-03-01) installed on the impregnation chamber**

One natural gas-fired process heater (ID No. ES-03-02)

One Direct Conditioning and Casing Cylinder (DCCC) line (ID No. ES-03-03)

*** This control device is optional and not used to demonstrate compliance with any applicable standard.*

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	(ID No. ES-03-02 only) 0.30 pounds per million Btu heat input	15A NCAC 02D .0503
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Sulfur dioxide	(ID No. ES-03-02 only) 2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Toxic air pollutants	State-enforceable only See Section 2.2 A	15A NCAC 02D .1100

1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of natural gas in this source (ID No. ES-03-02) that are discharged into the atmosphere shall not exceed 0.30 pounds per million Btu heat input.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 G.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for particulate matter emissions from the firing of natural gas in this source (ID No. ES-03-02).

2. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources (ID No. ES-03-01 and ES-03-03) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 G.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. For sources (**ID Nos. ES-03-01 and ES-03-03**), the Permittee shall maintain production records such that the process rates "P" in tons per hour, as specified by the formula above can be derived and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

Reporting [15A NCAC 02Q .0508(f)]

- d. No reporting is required for particulate emissions from sources (**ID Nos. ES-03-01 and ES-03-03**).
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

3. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source (**ID No. ES-03-02**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 G.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in this source (**ID No. ES-03-02**).

4. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (**ID Nos. ES-03-01, ES-03-02, and ES-03-03**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 H.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of these sources (**ID Nos. ES-03-01, ES-03-02, and ES-03-03**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 H.4.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii., above, cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

I. Final Casing Operation (ID No. ES-02-06)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible emissions	40 percent opacity	15A NCAC 02D .0521
Toxic air pollutants	State-enforceable only See Section 2.2 A	15A NCAC 02D .1100

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from this source (**ID No. ES-02-06**) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 I.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. The Permittee shall maintain production records, which specify the quantity of tobacco processed plus quantity of casings applied, such that the process rates "P" in tons per hour, as specified by the formula contained above can be derived, and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained or the types of materials and casing additions are not monitored.

Reporting [15A NCAC 02Q .0508(f)]

- d. No reporting is required for particulate emissions from this source (**ID No. ES-02-06**).

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-02-06**) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 I.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of this source (**ID No. ES-02-06**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from this source are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 I.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2.2 - Multiple Emission Source(s) Specific Limitations and Conditions

A. Facility-wide affected sources

State-enforceable only

1. 15A NCAC 02D .1100: CONTROL OF TOXIC AIR POLLUTANTS

- a. Pursuant to 15A NCAC 02D .1100 and in accordance with the approved application for an air toxic compliance demonstration (approved July 3, 2012), the following permit limits shall not be exceeded:

Stack ID No.	Emission Source ID No.	Stack Description	Ammonia (lb/hr)	Formaldehyde (lb/hr)
02-05B-01	ES-02-05B	Dryer No. 2 Stack 14a	7.04E-01	2.85E-02
02-05B-02	ES-02-05B	Dryer No. 2 Stack 19	2.22E+00	2.55E-02
02-05B-03	ES-02-05B	Dryer No. 2 Stack 23	1.69E+00	5.40E-02
02-05B-04	ES-02-05B	Dryer No. 2 Stack 30	4.12E+00	5.70E-02
02-05A-01	ES-02-05A	Dryer No. 1 Stack 9	8.87E-01	3.15E-02
02-05A-02	ES-02-05A	Dryer No. 1 Stack 18	7.09E-01	1.20E-02
02-05A-03	ES-02-05A	Dryer No. 1 Stack 29a	6.50E+00	6.90E-02
02-05A-04	ES-02-05A	Dryer No. 1 Stack 33a	5.76E-02	2.10E-02
02-09	ES-02-09	Hauni East	7.14E+00	3.75E-02
02-07	ES-02-07	Hauni West	2.08E+00	4.65E-02
02-02	ES-02-02	DCC Unit	2.05E-02	3.20E-02
02-03	ES-02-03	DCC Unit	2.05E-02	3.20E-02
02-04	ES-02-04	DCC Unit	2.05E-02	3.20E-02
02-08	ES-02-08	Steaming Tunnel #1	3.44E-02	5.35E-02
02-10	ES-02-10	Steaming Tunnel #2	3.44E-02	5.35E-02
04-03	ES-04-03	Menthol	4.80E-03	3.00E-03
02-06a	ES-02-06a	Final Casing Stack 2	2.80E-02	9.00E-03
02-06b	ES-02-06b	Final Casing Stack 4	2.32E-02	4.65E-03
03-02	ES-03-02	Process Heater	5.27E+00	1.88E+00
03-01	ES-03-01	TPP Conditioner	6.74E-03	1.52E-03
03-03	ES-03-03	DCC Unit	2.05E-02	3.20E-02

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

- b. No monitoring, recordkeeping or reporting is required.

2.3 - Permit Shield for Nonapplicable Requirements

The Permittee is shielded from the following nonapplicable requirements [15A NCAC 02Q .0512(a)(1)(B)].

- A. 15A NCAC 02D .0524, 40 CFR Part 60 Subpart IIII is not applicable to **(ID Nos. IEG-5, IEG-7, and IEG-9 through IEG-11)** because the diesel-fired emergency generators pre-date the NSPS regulation (existing prior to **July 11, 2005**).
- B. 15A NCAC 02D .0524, 40 CFR Part 60 Subpart JJJJ is not applicable to **(ID Nos. IEG-1, IEG-3, and IEG-8)** because the natural gas-fired emergency generators pre-date the NSPS regulation (existing prior to **June 12, 2006**).

SECTION 3 - GENERAL CONDITIONS (version 4.0 12/17/15)

This section describes terms and conditions applicable to this Title V facility.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environmental Quality upon request.

C. **Severability Clause** [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance
North Carolina Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 02Q .0514]

The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q .0514.

2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]

The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.

3. Minor Permit Modifications [15A NCAC 02Q .0515]

The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.

4. Significant Permit Modifications [15A NCAC 02Q .0516]

The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.

5. Reopening for Cause [15A NCAC 02Q .0517]

The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements

Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:

- a. changes in the information submitted in the application;
- b. changes that modify equipment or processes; or
- c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
 - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
 - i. the changes are not a modification under Title I of the Federal Clean Air Act;
 - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
 - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
 - iv. the Permittee shall attach the notice to the relevant permit.
 - c. The written notification shall include:
 - i. a description of the change;
 - ii. the date on which the change will occur;
 - iii. any change in emissions; and
 - iv. any permit term or condition that is no longer applicable as a result of the change.
 - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
3. Off Permit Changes [15A NCAC 02Q .0523(b)]

The Permittee may make changes in the operation or emissions without revising the permit if:

 - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
 - b. the change is not covered under any applicable requirement.
4. Emissions Trading [15A NCAC 02Q .0523(c)]

To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

I.A. Reporting Requirements for Excess Emissions and Permit Deviations [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

"Excess Emissions" - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. (*Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.*)

"Deviations" - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.

Excess Emissions

1. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
 - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:

- i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
 - name and location of the facility;
 - nature and cause of the malfunction or breakdown;
 - time when the malfunction or breakdown is first observed;
 - expected duration; and
 - estimated rate of emissions;
- ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
- iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

Permit Deviations

3. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
 - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

I.B Other Requirements under 15A NCAC 02D .0535

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

J. Emergency Provisions [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

1. An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
 - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. the permitted facility was at the time being properly operated;
 - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and

- d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. **Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 02Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508 (l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent; and
4. the method(s) used for determining the compliance status of the source during the certification period.

Q. **Certification by Responsible Official** [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. **Permit Shield for Applicable Requirements** [15A NCAC 02Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
 - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
 - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
 - c. the applicable requirements under Title IV; or
 - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. **Insignificant Activities** [15A NCAC 02Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. **Inspection and Entry** [15A NCAC 02Q .0508(l) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
 - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.
2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q .0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 02Q .0507(d)(4)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 02Q .0501(e)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **Prevention of Accidental Releases General Duty Clause - Section 112(r)(1) – FEDERALLY-ENFORCEABLE ONLY**

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

FF. **Title IV Allowances** [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or,

in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

HH. Registration of Air Pollution Sources [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

II. Ambient Air Quality Standards [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. General Emissions Testing and Reporting Requirements [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .0912, .1110, .1111, or .1415 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
 - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
 - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
 - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
 - iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.

- b. The Director may authorize the Division of Air Quality to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in Section 02D .2600 has precedence over all other tests.

KK. Reopening for Cause [15A NCAC 02Q .0517]

1. A permit shall be reopened and revised under the following circumstances:
 - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
 - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
 - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 02Q .0508(i)(16)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.

MM. Fugitive Dust Control Requirement [15A NCAC 02D .0540] - STATE ENFORCEABLE ONLY

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

NN. **Specific Permit Modifications** [15A NCAC 02Q.0501 and .0523]

1. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 02Q .0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA - Air Planning Branch, 61 Forsyth Street SW, Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
 - a. a description of the change at the facility;
 - b. the date on which the change will occur;
 - c. any change in emissions; and
 - d. any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

OO. **Third Party Participation and EPA Review** [15A NCAC 02Q .0521, .0522 and .0525(7)]

For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.

ATTACHMENT

List of Acronyms

AOS	Alternate Operating Scenario
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAIR	Clean Air Interstate Rule
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
DAQ	Division of Air Quality
DEQ	Department of Environmental Quality
EMC	Environmental Management Commission
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
NAA	Non-Attainment Area
NCAC	North Carolina Administrative Code
NCGS	North Carolina General Statutes
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
OAH	Office of Administrative Hearings
PM	Particulate Matter
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
tpy	Tons Per Year
VOC	Volatile Organic Compound